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11	Vietnam Veterans of America; Swords to Plowshard Rights Organization; Bruce Price; Franklin D. Roch	nelle; Larry	
12	Meirow; Eric P. Muth; David C. Dufrane; And Wra	y C. Forrest	
13	UNITED STATES DISTRICT COURT		
14	NORTHERN DISTRICT OF CALIFORNIA		
15	OAKLAND DIVISION		
	OAKLAND D	IVISION	
16			
17	VIETNAM VETERANS OF AMERICAN, et al.,	Case No. CV 09-0037-CW	
18	Plaintiffs,	DECLARATION OF GORDON P. ERSPAMER IN SUPPORT OF	
19	V.	PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR	
20	CENTRAL INTELLIGENCE AGENCY, et al.,	PROTECTIVE ORDER STAYING FURTHER DISCOVERY	
21	Defendants.		
22		Date: October 7, 2010 Time: 2:00 p.m.	
23		Ctrm: 2, 4th Floor Judge: Hon. Claudia Wilken	
24		Complaint Filed: January 7, 2009	
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28	EDSDAMED DECL IN SLIDD OF PLS 'ODD TO DEES 'MOT FOR I	DROTTECTIVE ORDER CTANING DIGG	

1	I, Gordon P. Erspamer, declare as follows:		
2	1. I am an attorney licensed to practice law in the State of California and am admitted		
3	to practice before this Court. I am a senior counsel with the law firm of Morrison & Foerster LL		
4	counsel of record for Vietnam Veterans of America, Swords to Plowshares: Veterans Rights		
5	Organization, Bruce Price, Franklin D. Rochelle, Larry Meirow, Eric P. Muth, David C. Dufrane		
6	and Wray C. Forrest ("Plaintiffs") in this action. I submit this Declaration in Support of		
7	Plaintiffs' Opposition to Defendants' Motion for Protective Order Staying Further Discovery. I		
8	make this Declaration based on personal knowledge. If called as a witness, I would testify to the		
9	facts set forth below.		
10	2. Attached hereto as Exhibit A is a true and correct copy of the transcript of the		
11	hearing on Plaintiffs' Motion to Compel Responses to Interrogatories in this action, held on June		
12	30, 2010 before the Honorable James Larson, Magistrate.		
13			
14	I declare under penalty of perjury under the laws of the United States of America that the		
15	foregoing is true and correct and that this Declaration was executed in San Francisco, California		
16	on this 16th day of September, 2010.		
17	/c/ Condon D. Erromana		
18	/s/ Gordon P. Erspamer Gordon P. Erspamer		
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